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October 7, 2019

VIA ECF

Honorable Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
Courtroom 17A
500 Pearl Street
New York, NY 10007

RE: Eastern Profit Corporation Limited v. Strategic Vision US LLC
Case No. 18-cv-2185-JGK-DCF

Dear Judge Freeman:

We are newly retained counsel for Eastern Profit. We write in response to Mr. Greim's letter of Friday evening. To the extent that his letter suggested that we or our client disregarded Your Honor's discovery orders, it was wholly inaccurate. Indeed, we and Mr. Greim had been engaging in a good-faith exchange regarding available dates, and we were very surprised to see Mr. Greim's letter to your Honor, which came fewer than 24 hours after our most recent prior email on the subject (in which we told Mr. Greim we would need to check with our client regarding availability on the latest round of proposed dates and would revert promptly).

In the wake of further discourse Friday evening and conversations today, we can report that there is no dispute between Strategic Vision and Eastern Profit over the date of the continued deposition of Eastern Profit's 30(b)(6) witness, Yvette Wang. We have agreed to make Ms. Wang available on October 30, and Mr. Greim has accepted that date.

As to the deposition of Mr. Chunguang Han, we have offered to make him available November 11. Mr. Greim has refused this offer, contending that he believes the deposition should take place in October.¹ Given all of the other discovery that Mr. Greim is seeking (such as the third-party depositions of Steve Bannon and a Washington Times journalist, just by way of example), we are unaware of any prejudice that Mr. Greim's client will suffer by proceeding with

¹ Mr. Greim notes that "we should all reserve November 11 just to be safe," conceding that he is in fact available on that date to take Mr. Han's deposition, but he apparently still wishes to present his request for an October date to the Court.



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the deposition of Mr. Han on November 11 rather than in October. Indeed, our understanding is that the information that Strategic Vision seeks from Mr. Han is duplicative of the information that Strategic Vision seeks from Eastern Profit's continued 30(b)(6) deposition, now set for October 30.

We will continue to work with our client to see if Mr. Han can rearrange his schedule to make himself available any earlier than November 11, but as of this writing our understanding is that he is not available in October. Given that we are obliged to respond to Mr. Greim's letter today, we submit our position as described above.

Respectfully submitted,

/s/ Francis J. Lawall

Francis J. Lawall